UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RADLEY BRADFORD, individually,
and on behalf of all others similarly
situated,

Plaintiff,

v.

Case No. 4:23-cv-03659

COMCAST CABLE COMMUNICATIONS, LLC,

Defendant.

UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSE TO DEFENDANT'S RULE 12(b)(1) AND 12(b)(6) MOTION TO DISMISS

NOW COMES RADLEY BRADFORD ("Plaintiff"), by and through his undersigned counsel, moving this Honorable Court to extend the time for Plaintiff to file his response to COMCAST CABLE COMMUNICATIONS, LLC'S ("Defendant") Rule 12(b)(1) and 12(b)(6) Motion to Dismiss, and in support thereof, stating as follows:

- 1. On September 28, 2023, Plaintiff filed the instant class action against Defendant seeking redress for violations of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 *et seq*. [Dkt. 1]
- 2. On December 18, 2023, Defendant filed a Rule 12(b)(1) and 12(b)(6) Motion to Dismiss ("Defendant's Motion"). [Dkt. 11]
- 3. Pursuant to Local Rule 7.4(B), Plaintiff's response to Defendant's Motion is due on or before January 8, 2024.

4. Due to the recent holiday season and other professional deadlines for Plaintiff's counsel, Plaintiff is respectfully requesting an extension through February 5, 2024 to file his

response to Defendant's Motion.

5. Plaintiff's counsel conferred with Defendant's counsel regarding the relief sought

herein and Defendant has no objection.

6. The extension is sought in good faith and will not prejudice Defendant.

7. Based on the foregoing, there is good cause to grant the extension sought herein.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order (1) extending

the deadline for Plaintiff to submit her response to Defendant's Motion through February 5, 2024;

(2) extending the deadline for Defendant to submit its reply through February 12, 2024; and (3)

granting any further relief this Court deems appropriate.

Dated: January 8, 2024

Respectfully submitted,

RADLEY BRADFORD

By: /s/ Mohammed O. Badwan

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, certify that on January 8, 2024, the foregoing document was filed electronically using the Court's CM/ECF system, which will accomplish service on all counsel of record.

/s/ Mohammed O. Badwan